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SECRETARY, BOARD OF  
OIL, GAS & MINING

Julie Ann Carter, Board Secretary  
State of Utah Board of Oil, Gas & Mining  
1594 West North Temple, Suite 1210  
Salt lake City, Utah 84116

Subject: Docket 2015-011, Cause 196-45

Link: <https://drive.google.com/file/d/0Bz3e5gQnVPIRVmwzNEM2Rm8yM0E/view?usp=sharing>

Canyonlands National Park, Moab residents and over 500,000 visitors to the Big Flats area just north of Canyonland National Park were promised by the BLM and Fidelity in an Environmental Analyses (EA) that the construction of the Dead Horse Point Lateral Pipeline would stop all flaring of gas, improve air quality, improve the economy of Moab, return the dark night skies in Canyonland National Park, and prevent the wasting of a valuable national resource. The Fidelity Oil and Exploration request to continue flaring of Well 31-1-25-19 (API 43-019-50037) will negate most of the reasons for the construction of the pipeline.

The link above is to the original EA (DOI-BLM-UT-Y010-2013-67 EA) prepared by the BLM for the Dead Horse Lateral Pipeline. I have referenced several comments below from the EA, with the pdf page numbers, which clearly show all the current and future benefits that would occur in the area from eliminating flaring.

1. ( Page 21) *"The BLM's consideration of the Proposed Action responds to concerns regarding the disposition of natural gas, which is currently being flared, from existing productive wells, contrary to federal and state regulations."*
2. (Page45) *"Observable flares, which are commonly seen at night by nearby observers as well as from viewers at distant viewpoints, would be eliminated."*
3. (Page 50) *"Emissions of pollutants and GHGs would be reduced by the delivery of natural gas to market via a pipeline rather than destruction with flares. "*
4. (Page 79) *"At night, the flares are visible from more distant locations, including from Arches NP and the Sand Flats Special Recreation Management Area, located east of Moab and approximately 20 miles away. Visible flares compromise the appearance of otherwise dark rural night skies."*
5. (Page 119) *"This gas is currently flared on-site, with no economic benefit to governments from mineral royalties and/or severance taxes on production)"*

6. Reduction in HAPS emissions with pipeline 42.7% Page 140

Table 4-15: Comparison of Cumulative Production Emissions from Wells Only (TPY)

Source	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	VOCs	HAPs	CO <sub>2</sub> e emissions (tonnes/year)
Alternatives A and C- Cumulative Well Emissions	43.0	34.0	1.4	1.4	0	373.7	54.4 <sup>1</sup>	33,341
Alternative B - Cumulative Well Emissions	780.3	169.5	1.4	1.4	0	1,571.4	94.8	328,524
Increase in Well Emissions that would result from Alternative B	737.3	135.5	0	0	0	1,197.7	40.4	292,183
% Decrease in Well Emissions that would result from Alternatives A or C	94.5%	79.9%	-	-	-	76.2%	42.7%	89.9%

Source: Golder, 2013

Fidelity and the BLM had many outstanding reasons to build the Dead Horse Point Lateral Pipeline to eliminate flaring from wells next to Canyonland National Park. The reasons are still valid and permitting flaring of even one well partially negates the benefits of controlling air pollution. The flaring of one well will completely negates the promised benefits of the pipeline to Canyonlands National Park and the 500,000 people who use the area each year.

Sincerely:

William Love  
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